



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

JUL 10 2015

Jeffery Childers  
Soda Mountain Solar Project Manager  
22835 Calle San Juan De Lagos  
Moreno Valley, California 92553

Subject: Final Environmental Impact Statement for the Soda Mountain Solar Project, San Bernardino County, California (CEQ #20150163)

Dear Mr. Childers:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Soda Mountain Solar Project. Our review and comments are provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508), and our NEPA review authority under §309 of the Clean Air Act.

The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Bureau of Land Management on March 3, 2014. We rated the DEIS as *Environmental Concerns—Insufficient Information* (EC-2), primarily due to potential direct and indirect impacts to groundwater and site hydrology. Previously, on November 21, 2012, the EPA provided extensive formal scoping comments for the proposed project.

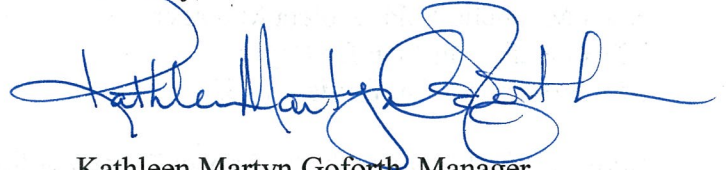
We appreciate the efforts of the BLM, the applicant, and its consultants to respond to our DEIS comments, and we commend the applicant, State, and federal agencies for developing alternatives and additional substantial mitigations that support environmentally preferable outcomes. In particular, we were pleased to see: a reduction of the potential impacts to state waters and desert tortoise as a result of the proposed reduction of the solar farm footprint by 575 acres; additional mitigation measures to minimize on- and off-site hydrologic impacts; implementation of a groundwater well test; and implementation of a groundwater monitoring plan.

We recommend that all mitigation measures and applicant proposed measures be adopted in the Record of Decision and be included as conditions in construction contracts and any other approvals, as appropriate, to minimize adverse environmental impacts to the extent possible. If any mitigation measures in the FEIS are not adopted, the ROD should explain the basis for the decision not to adopt them.

We also recommend that the BLM consider protecting non-developed portions of the right-of-way after final project approval. Some or all of the remaining 2,532 acres within the right-of-way that the applicant has carefully chosen to avoid may now warrant protection from future development. Additionally, we recommend that the reasonable and prudent measures, as well as the terms and conditions, of the biological opinion be incorporated into the ROD.

We are available to discuss all recommendations provided. Please send one hard copy and one CD ROM copy of the ROD to this office when they are filed with our Washington D.C. office. If you have any questions, please contact me at 415-972-3521, or contact Scott Sysum, the lead reviewer for this project. Scott can be reached at 415-972-3742 or [sysum.scott@epa.gov](mailto:sysum.scott@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kathleen Martyn Goforth', with a stylized flourish at the end.

Kathleen Martyn Goforth, Manager  
Environmental Review Section